

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In Re: David A Jerri

Chapter: 13

Debtor

Bankruptcy No.: 20-11263-amc

11 U.S.C. § 362

Wilmington Savings Fund Society, FSB, d/b/a Christiana
Trust, not individually but as trustee for Pretium
Mortgage Acquisition Trust

Movant

vs.

David A Jerri

Debtor

and

William C. Miller, Esq.

Trustee

RESPONDENTS

CERTIFICATION OF DEFAULT

I, Michael Clark, Esquire, Attorney for Movant, hereby certify that Debtor has defaulted upon the terms of the Stipulation in Settlement of Movant's Motion for Relief from the Automatic Stay approved by the United States Bankruptcy Court on January 20, 2021. It is further certified that the attached Notice of Default dated May 31, 2021, was served upon the Debtor and Debtor(s) counsel in the manner specified under Paragraph 5 of the Stipulation on said date. Subsequently, Debtor failed to cure the default. Accordingly, Movant respectfully requests that this Honorable Court enter the attached Order granting Movant's relief from the automatic stay.

Respectfully submitted,

/s/ Michael Clark

Richard M. Squire, Esq.

M. Troy Freedman, Esq.

Michael J. Clark, Esq.

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Dated: June 16, 2021

In Re: David A Jerri

Debtor

Chapter: 13

Bankruptcy No.: 20-11263-amc

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ORDER VACATING THE AUTOMATIC STAY UNDER 11 U.S.C. § 362

AND NOW, this _____ day of _____, 2021, upon consideration of
Movant's Motion for Relief from the Automatic Stay; it is hereby

ORDERED that the Automatic Stay of all proceedings, as provided under § 362 of the Bankruptcy Reform
Act of 2005, 11 U.S. C. § 362, as amended, is vacated with respect to the mortgaged premises situated at 400
LOUISE AVENUE, CROYDON, PA 19021, ("Property") as to allow Movant to exercise its rights under its loan
documents and state law; and it is

FURTHER ORDERED that the relief granted by this Order shall be effective immediately and shall not
be subject to the fourteen (14) day period set forth in Fed. R. Bankr. P. 4001 (a)(3).

BY THE COURT:

Honorable Judge Ashely M. Chan
United States Bankruptcy Judge

cc:

William C. Miller, Esq.
Chapter 13 Trustee
P.O. Box 1229
Philadelphia, PA 19105

United States Trustee
Office of the U.S. Trustee
200 Chestnut Street
Suite 502
Philadelphia, PA 19106

Michael Clark

Richard M. Squire & Associates, LLC
115 West Avenue, Suite 104
Jenkintown, PA 19046

Brad J. Sadek
Sadek and Cooper
1315 Walnut Street
Suite 502
Philadelphia, PA 19107

David A Jerri
4000 Louise Avenue
Croydon, PA 19021

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CERTIFICATE OF SERVICE

I hereby certify that I am over 18 years of age; and that service upon all interested parties, indicated below, was made by sending true and correct copies of the Certification of Default electronically and/or via First Class Mail, postage prepaid.

Date Served: June 16, 2021

William C. Miller, Esq.
Chapter 13 Trustee
P.O. Box 1229
Philadelphia, PA 19105

United States Trustee
Office of the U.S. Trustee
200 Chestnut Street
Suite 502
Philadelphia, PA 19106

David A Jerri
4000 Louise Avenue
Croydon, PA 19021

Brad J. Sadek
Sadek and Cooper
1315 Walnut Street
Suite 502
Philadelphia, PA 19107

I hereby certify the foregoing to be true and correct under penalty of perjury.

Respectfully submitted,

/s/ Michael Clark

Richard M. Squire, Esq.

M. Troy Freedman, Esq.

Michael J. Clark, Esq.

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